

KATHLEEN J. ENGLAND, NV Bar No. 206
GILBERT & ENGLAND LAW FIRM
610 South Ninth Street
Las Vegas, Nevada 89101
Phone: 702.529.2311
E-mail: kengland@gilbertenglandlaw.com
Attorneys for Plaintiff Courtney Knight

Sheri Thome, NV Bar No. 08657
Chad Butterfield, NV Bar No. 10532
WILSON, ELSER, MOSKOWITZ, EDELMAN & DICKER LLP
300 South 4th Street, 11th Floor
Las Vegas, Nevada 89101-6014
Phone: (702) 727-1370
E-mail: sheri.thome@wilsonelser.com
E-mail: chad.butterfield@wilsonelser.com
*Attorneys for Defendants, Beasley Broadcasting of NV, LLC,
Beasley Media Group, Inc., Beasley Broadcasting Group, Inc.*

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

COURTNEY KNIGHT,
Plaintiff,

v.

BEASLEY BROADCASTING OF
NEVADA, LLC, a North Carolina
Corporation; BEASLEY MEDIA GROUP,
INC., a Delaware Corporation; BEASLEY
BROADCASTING GROUP, INC., a
Delaware Corporation; DOES I through X,
and ROE BUSINESS ENTITIES I through X,
inclusive,
Defendant.

Case No.: 2:16-cv-02648-JAD-PAL

**JOINT STIPULATION REQUESTING
EXTENSION OF DEADLINE FOR ENE
STATEMENTS**

(FIRST REQUEST)

At the initiation of Plaintiff, Plaintiff Courtney Knight ("Plaintiff") and Defendants Beasley Broadcasting of Nevada, LLC, Beasley Media Group, Inc., and Beasley Broadcasting Group, Inc. ("Defendants"), by and through their counsel of record, hereby stipulate to request this Court to extend the deadline for the parties to submit their confidential ENE Statements to Magistrate Judge Foley's chambers by noon on **Wednesday, February 22, 2017**. Pursuant to

1 the Order Scheduling Early Neutral Evaluation Session (ECF No. 12) and Fed. R. Civ. P.
2 6(a)(1)(C), the current deadline for this submission is February 21, 2017 (in that the CM/ECF
3 generated deadline is listed as February 20, 2017, a federal holiday.)

4 The parties respectfully submit that good cause for this extension exists in light of that
5 holiday, and the fact that the parties are continuing to exchange documents and information as
6 promised to each other, as set forth in their proposed "Discovery Plan and Scheduling Order"
7 filed on February 10, 2017 (ECF No. 19), to facilitate the discussions at the ENE on February
8 27, 2017.

9
10
11 Respectfully submitted,

12 Dated: February 17, 2017

13 GILBERT & ENGLAND LAW FIRM

14 By: /s/

15 Kathleen J. England
16 610 South Ninth Street
17 Las Vegas, Nevada 89101-7013

18 *Attorneys for Plaintiff,*
19 *COURTNEY KNIGHT*

20 Dated: February 17, 2017

21 WILSON, ELSER, MOSKOWITZ, et al.

22 By: /s/

23 Sheri Thome
24 300 South 4th Street, 11th Floor
25 Las Vegas, Nevada 89101-6014

26 *Attorneys for Defendants,*
27 BEASLEY BROADCASTING OF
28 NEVADA, LLC, BEASLEY MEDIA
GROUP, and BEASLEY BROADCASTING
GROUP, INC.

IT IS SO ORDERED.

Dated: 2/21/17



United States Magistrate Judge

GILBERT & ENGLAND LAW FIRM
610 SOUTH NINTH STREET
LAS VEGAS, NEVADA 89101
PHONE (702) 529-2311